

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

TIMEBASE PTY LTD.,

Civil No. 07-1687 (JNE/JJG)

Plaintiff,

vs.

THE THOMSON CORPORATION, WEST
PUBLISHING CORPORATION, and
WEST SERVICES, INC.,

Defendants.

**DECLARATION OF KATHERINE S. RAZAVI
IN SUPPORT OF DEFENDANTS' MOTION
TO COMPEL DISCOVERY FROM TIMEBASE**

I, Katherine S. Razavi, declare as follows:

1. I am an attorney with the law firm of Faegre & Benson LLP, am licensed to practice in the State of Minnesota, am admitted to practice before this Court and am one of the attorneys representing the Defendants The Thomson Corporation, West Publishing Corporation, and West Services, Inc. (collectively "defendants") in connection with the above action.

2. This declaration is submitted on behalf of DEFENDANTS' MOTION TO COMPEL DISCOVERY FROM TIMEBASE.

3. Attached hereto as Exhibit 1 is a true and correct copy of Defendants' First Set of Interrogatories to Plaintiff TimeBase (Nos. 1-5).

4. Attached hereto as Exhibit 2 is a true and correct copy of TimeBase's Response to Defendants' Interrogatories 1-5. Information designated as "Confidential – Attorneys' Eyes Only" has been redacted. This redacted information is not relevant to Defendants' Motion to Compel Discovery from TimeBase.

5. Attached hereto as Exhibit 3 is a true and correct copy of the PreTrial Scheduling Order (Patent Cases).

6. Attached hereto as Exhibit 4 is a true and correct copy of TimeBase's Statement of Production of Documents Pursuant to Fed. R. Civ. P. 34.

7. Attached hereto as Exhibit 5 is a true and correct copy TimeBase's Responses to Defendants' First Set of Requests for Production of Documents (Nos. 1-49).

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: October 6, 2009



Katherine S. Razavi